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E-Filed 7/17/2009

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15
16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA

18 In re SILICON STORAGE TECHNOLOGY,
19 INC., DERIVATIVE LITIGATION

Master File No. C 06-04310 JF

20 **STIPULATION AND [PROPOSED]
21 ORDER FOR FILING AMENDED
COMPLAINT AND MOTION TO
DISMISS BRIEFING SCHEDULE**

22 This Document Relates To:
ALL ACTIONS.

23 Trial Date: None

WHEREAS, on July 7, 2009, this Court issued an order granting the Director Defendants' Motions to Dismiss with respect to the federal claims and allowing Lead Plaintiffs leave to amend the Second Verified Consolidated Amended Shareholder Derivative Complaint;

WHEREAS, Lead Plaintiffs have requested and Defendants have consented to allow Lead Plaintiffs additional time to file a Third Verified Consolidated Amended Shareholder Derivative Complaint (“Amended Complaint”);

WHEREAS, a Case Management Conference has been set for November 6, 2009;

WHEREAS, subject to the Court's approval, the parties stipulate as follows:

- 1) Lead Plaintiffs shall file an Amended Complaint by August 21, 2009;
- 2) Defendants shall move to dismiss, or otherwise respond to, Lead Plaintiffs' Amended Complaint by September 24, 2009;
- 3) Lead Plaintiffs shall file any opposition to Defendants' motion(s) to dismiss by October 28, 2009;
- 4) If Defendants file and serve a reply to Lead Plaintiffs' opposition, they will do so by November 16, 2009;
- 5) The hearing on Defendants' Motions to Dismiss or other responsive pleading and Case Management Conference shall be set for December 4, 2009 or other day as ordered by the Court.

By executing this Stipulation, the parties have not waived and expressly retain all claims, defenses and arguments whether procedural, substantive or otherwise. This Stipulation is without prejudice to any subsequent motion to stay this action, or any objections or defenses thereto, and this Order is entered without prejudice to the rights of any party to apply for a modification of this Order.

IT IS SO STIPULATED.

DATED: July 16, 2009

Respectfully Submitted,

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DATED: July 16, 2009

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DATED: July 16, 2009

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Attorneys for Director Defendants

DATED: July 16, 2009

HOGAN & HARTSON LLP

/S/ Howard S. Caro

HOWARD S. CARO

Attorneys for Officer Defendants

ATTESTATION PURSUANT TO GENERAL ORDER 45

I, Nichole T. Browning, attest that concurrence in the filing of this document has been obtained from the other signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 16th day of July, 2009, at San Francisco, California.

/S/ Nichole Browning

NICHOLE BROWNING

* * *

ORDER

PURSUANT TO STIPULATION AND FOR GOOD CAUSE SHOWN HEREIN, IT IS SO
ORDERED.

DATED: July 17, 2009

Judge of the U.S. District Court
Honorable Jeremy Fogel

CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2009, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 16, 2009.

/S/ Nichole Browning

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Mailing Information for a Case 5:06-cv-04310-JF

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- (No manual recipients)